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November 2, 2020

Carrie Vicenta Meadows
Agriculture Advisor to the Administrator
1200 Pennsylvania Avenue, NW
Room 3312c, WJC-N
Washington, D.C. 20460

Certified Mail

Dear Ms. Meadows:

It was a pleasure meeting you and Susan Park at the Florida citrus grower meeting in Frostproof a couple weeks ago. You may remember that I spoke on behalf of Premier Citrus, LLC., a commercial grower and its related companies that together operate as one of Florida's largest citrus producers. Premier manages over 20,000 acres large citrus plantings in seven counties as well as owning and operating one of Florida's largest citrus packinghouses.

First let me thank you for all the help you already provide the Florida citrus producers in your capacity within the EPA. Given the difficulties we've had with and the canker epidemic and now greening HLB disease, as well as the recent hurricanes Matthew and Irma, it's not a stretch to say that without your help and the Federal governments help, all of us Florida citrus growers would be in a significantly worse place.

To that point, I would like to reiterate some of the points we made in Frostproof, and why we again need your help.

My company and our industry want to do everything we can to help the registrant AgLogic with their product 15GG "Aldicarb" through the EPA re-registration process in time for use for the next citrus crop cycle, hopefully by January 1, 2021. As you know, the only proposed allowable periods for application are in the first quarter of the calendar year, so missing that deadline would force us to wait another full year for the chance to use the product.

The simple reason for our request is that this product Aldicarb had a long history as the most useful registered agrichemical the Florida citrus growers ever had with respect to improved yields (productivity). Prior to its voluntary withdrawal by the then registrant Bayer in 2010, Aldicarb was one of the most trusted and predictive-results compounds used by Florida growers to increase yields.

My personal experience in crop management goes all the way back to 1980 when I first became actively involved and responsible for the selection and use of citrus pesticides. Since

Aldicarb first became available in Florida, we used the product on practically all our managed acres at the labeled rate due to the easiest of all metrics to track: higher yields & higher earnings.

Aldicarb was specifically labeled and effective for control of certain insect, mite, and nematode pests. However, beyond the control of specific pests, growers became aware of its unusual promotion of improved tree health and productivity beyond what one would expect from just the control of those specific pests. Most of Florida's crop managers came to accept this effect as a "PGR effect" (plant growth response) which provided a direct correlation of Aldicarb use and improved health and yield. The yield improvements were easily observed, including significant documentation by researchers, and of course directly drove improved revenues, well beyond the cost of the material. Aldicarb was one if not the most clearly cost-effective citrus pesticides we've ever had in Florida citrus.

Improved yields were most often a result of improved size, which always carries a premium in the fresh fruit business. That size improvement as well as overall blemish control was easily noticed in the packinghouse and drove more favorable size and quality packages, again driving up revenues for fresh fruit as well as juice fruit.

In fact, the product was so important to our annual production plan that actively participating in complying with the Stewardship program was a high company priority to insure that by our safe use we could help the registrant keep the product available out into the future. It was a major disappointment when Bayer voluntarily pulled the label in 2010, and we believe strongly that its discontinued use and loss of the PGR and other effects coincided and contributed to both our company and the Florida industry yield decline as the additional pressure of ACP and HLB expanded and has contributed to this day.

Again, you might ask, given the full range of support you have provided relative to all the HLB disease assistance, does this request for help with a specific compound deserve special attention? The answer is "Yes"

Despite the industry spending over \$200mm of its own funds through the CRDF (I was President for its first nine years of its existence) to research and determine practices to control or suppress citrus HLB, and despite learning a lot about the disease and the infecting psyllid insect vector, there is very little if any practical outputs from the research to date that the growers can actually use to suppress symptoms and improve yields. The most dominant recommendation now from the Foundation or even the University of Florida's IFAS extension is to "do the common practices better" and improve your chances of "higher productivity" within the static condition of the presence of HLB everywhere.

In other words, use whatever tools we have to limit tree stress and improve productivity -- that is practically all we have after ten years of considerable and high-quality research. It is not a knock on the researchers or the funding, but more a reflection of the difficulty of solving a very complex disease on a perennial tree crop.

So yes, this compound - Aldicarb - has the history (and the data and the grower use endorsement) of improved yield productivity that rises to the only real recommendation for combating HLB we have until some alternative emerges. Aldicarb will help improve our productivity and with it our revenues to keep us in business.

Aldicarb is a real and available compound with a long and real history of improving tree health, the most critical recommendation that we have for withstanding HLB until some other "therapy" arrives. The industry is now waiting on some biopesticide therapy to arrive, but from our perspective and likely yours, that is several seasons away. We desperately need help now.

Thank you for considering our request for your assistance within the EPA for obtaining an expedited review of Aldicarb re-registration for Florida citrus which should allow use the use of this valuable compound for the next crop season.

And thanks again for your continuing support of the Florida citrus growers.

A handwritten signature in black ink, appearing to read "Walter T. Jerkins, Jr.", with a stylized flourish at the end.

Walter T. Jerkins, Jr.
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Date : October 30, 2020

To: Ms Carrie Vicenta Meadows
Agriculture Advisor to the Administrator
1200 Pennsylvania Ave, NW
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Washington, D.C. 20460

From: William G Roe II
VP Operations
Wm. G. Roe & Sons Inc.
P O Box 900
Winter Haven, FL 33882

Re: Re-registration of Aldicarb for citrus in Florida under the name of AG Logic

Dear Ms. Meadows:

As one of the many growers who were present at the Frostproof meeting last week concerning the re-registration of Aldicarb on citrus, I want to express my appreciation for your attendance and sincerity during the meeting. It was rewarding as a grower to believe that this terrific product might once again become available to our industry!

I am writing this letter primarily to encourage the swift approval of this product, and to emphatically underscore the sincerity of my conviction that the re-registration of this product alone will have a significant positive impact on our industry, probably moreso than anything else that has come across the horizon in the past 10 years.

My family's business has been operating since 1925 and currently manages about 2,000 acres. Currently we have 11 members of the collective family working in the business with 6 members of the 4th generation involved in some way or another. Our packing business is the No.1 supplier of Florida tangerines and pomelos into the U.S. market, that product being sold under the "NOBLE" brand. I have been active in the horticultural side of our business and industry since 1976, and have served as a past president of the Florida Production Manager's Association amongst other activities.

As we both know, Aldicarb is a unique chemical of the carbamate family which was registered in 1979 under the brand name "Temik" and which was used in the citrus industry with extraordinary success for 30 years before its voluntary removal from the market by Bayer in 2010. Bayer's decision not to continue marketing Temik was a financial decision that came as a great disappointment to the citrus industry, but it wasn't the first time and probably not the last time the industry has been a pawn to greater agriculture. Be that as it may, currently the new registrant has obtained a section 3 registration for Aldicarb in the name of Ag Logic for application on cotton and soy in Florida and for cotton, soy, peanuts, sweet potatoes, sugar beets, and dry beans elsewhere. Given the extraordinary success of the past stewardship program for Florida citrus, and the product's uniquely effective attributes for the citrus production scheme in Florida, it would seem logical that approval for citrus application is an easy reach.

Aldicarb is unique in that it is applied in the ground and chiseled in with disc blades. It has a long window of efficacy against a myriad of mites and foliar feeding pests of citrus which explode during the spring as the new flush develops and bees are

foraging. Its ability to suppress these mites and other pests during the bee foraging timeframe without impacting the bees or other beneficial insects like the ladybug, enables the grower to avoid application of foliar pesticides during that critical window when application is discouraged. Aldicarb is particularly helpful in establishing an integrated pest management program because it is not harmful to the beneficial insects which prey on the sucking and feeding pests of citrus. Because of these attributes I found that in time I actually reduced my foliar pesticide usage in the blocks where I applied "Temik". Over the years Aldicarb has shown strong efficacy against the nematode complex and has a proven and dynamic record of PGR (plant growth regulator) type impacts to citrus. As a fresh fruit grower, I could ramble on and on about the virtues of this product, not to exclude the process juice faction of the industry from whom you heard substantial accolades the other day. But, in the name of brevity let me sign off with a final request to recommend approval of this incredible product which is sorely needed in our Florida citrus industry today.

Thanks in advance for you valuable time and consideration. My contact info is Bill Roe 863-287 8572
broe@wgroe.com

Highest Regards,

A handwritten signature in black ink, appearing to read "Bill", with a stylized flourish extending from the end.